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ATTORNEYS FOR DEFENDANTS GERRY
SPENCE TRIAL INSTITUTE, GERALD L.
SPENCE, REX PARRIS, JOSEPH LOW, JOHN
ZELBST, KENT SPENCE AND GERRY SPENCE
METHOD AT THUNDERHEAD RANCH, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

THE TRIAL LAWYERS COLLEGE, a nonprofit
corporation,

Plaintiff.

vs.

GERRY SPENCE TRIAL INSTITUTE, a
nonprofit corporation and GERALD L. SPENCE,
JOHN ZELBST, REX PARRIS, JOSEPH H.
LOW, KENT SPENCE, JOHN JOYCE, and
DANIEL AMBROSE, individuals, GERRY
SPENCE METHOD AT THUNDERHEAD
RANCH, INC.,

Defendants.

Civil Action No. 1:20-CV-00080-JMC

DEFENDANTS' MOTION FOR CONTEMPT

Defendants other than Daniel Ambrose (“Moving Defendants”) respectfully request that the Court enter an order holding Plaintiff The Trial Lawyers College (“Plaintiff” or “TLC”), in contempt of this Court for its violations of the Permanent Injunction entered in this case (Dkt. 588). This Motion is supported by the contemporaneously filed legal memorandum and the Declaration of Beth Kushner.

Moving Defendants attempted to conciliate this Motion on the following days, by letters that were emailed to Chris Ralston:

October 16, 2024, October 17, 2024, October 18, 2024, October 22, 2024,
October 23, 2024, and October 25, 2024

TLC’s counsel did not acknowledge, much less substantively respond to, those efforts. Accordingly, Moving Defendants are unable to provide the Court with Plaintiff’s position on this Motion.

Respectfully submitted this 15th day of November, 2024.

/s/ Beth J. Kushner

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copy of the foregoing document has been served electronically by transmission to an electronic filing service provider for service through the Court's CM/ECF system to all parties on November 15th, 2024.

/s/ Beth J. Kushner

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